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June 2, 2024

VIA ECF

Hon. James M. Wicks, U.S.M.J.
United States District Court Eastern District of New York
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Superb Motors Inc., et al. v. Deo, et al.
Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

The undersigned represents the Superb Plaintiffs who submit this letter, jointly, with counsel for all parties pursuant to the Court's directive for the parties to provide a joint status report concerning discovery.

The parties have exchanged responses to document demands and interrogatories. Defendants¹ have timely produced responses and documents in accordance with the Court's January 24, 2024 Order and continue to produce documents. Plaintiffs have timely produced responses and have stated in their responses to Defendants' document demands that responsive documents will only be produced once a confidentiality order is in place. An initial draft of a proposed confidentiality order was circulated by Plaintiffs to the Defendants on April 26, 2024. Annexed hereto is a copy of this Confidentiality Order for the Court for its consideration which the parties respectfully request be So-Ordered.

Now that the extensive motion briefing is complete, the parties will need some time to review the substantial number of documents exchanged (and which continue to be exchanged) and then meet and confer on any deficiencies. Thereafter, the parties will schedule depositions, which will exceed a dozen between the parties.

The parties are available to discuss at the Court's convenience.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

¹ Except for Chase Bank, who has not responded to the Deo Defendants' Interrogatories as it is still searching for documents and information responsive to the Deo Defendants' Interrogatories. Chase Bank has produced documents that are responsive to the Deo Defendants' Document Demands and continues to search for documents responsive to the remaining requests. To the extent that Chase Bank has not served formal responses to the Deo Defendants' Document Demands, Chase Bank has advised that formal responses will be served by June 10, 2024.